

# **Defendant's Exhibit 56**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., MDL No. 2843  
CONSUMER USER PROFILE Case No.  
LITIGATION 18-md-02843-VC-JSC

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This document relates to:  
ALL ACTIONS  
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\*\*HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY\*\*  
ZOOM DEPOSITION OF FACEBOOK'S 30(b)(6)  
CORPORATE REPRESENTATIVE - HARRISON FISK  
(Reported Remotely via Video & Web Videoconference)  
Menlo Park, California (Deponent's location)  
Tuesday, August 16, 2022  
Volume 1

STENOGRAPHICALLY REPORTED BY:  
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JOB NO. 5345585  
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UNITED STATES DISTRICT COURT  
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DEPOSITION OF HARRISON FISK, taken on  
behalf of the Plaintiffs, with the deponent located  
in Menlo Park, California, commencing at  
9:12 a.m., Tuesday, August 16, 2022, remotely  
reported via Video & Web videoconference before  
REBECCA L. ROMANO, a Certified Shorthand Reporter,  
Certified Court Reporter, Registered Professional  
Reporter.

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1 part -- so in Scuba, you can view like the 11:55:07  
2 structure of a table. But you have to know which  
3 table you're interested in. And so that's where  
4 you'd have to know the -- the table that's --  
5 contains these ads -- I believe you're saying ads 11:55:15  
6 clicks. And once you have that, you can then look  
7 up the metadata associated with that specific  
8 table.

9 Q. (By Mr. Samra) Is there any document  
10 showing what the field names are in these -- the 11:56:04  
11 tables associated with ads\_clicked?

12 MS. RICHARDSON: Objection. Vague.  
13 Scope.

14 THE DEPONENT: I mean, I'm not aware of a  
15 document like that. Again, the team may have 11:56:22  
16 something, but I don't know. There's -- there's no  
17 like automatic thing that describes anything.

18 Q. (By Mr. Samra) And is that the same for  
19 ad clicks and revenue?

20 A. Yes. 11:56:50

21 Q. Do third parties have access to analytics  
22 provided from Scuba?

23 A. No.

24 Q. Do third parties have access to Presto?

25 A. No. Whenever a third party could 11:57:31

1 potentially have any sort of access, there's always 11:57:37  
2 a lot of controls in order to restrict and ensure  
3 that doesn't happen inappropriately.

4 Q. When could a third party have access?

5 A. Directly into Scuba or Hive, I'm not 11:58:01  
6 aware of any.

7 Q. What about Presto?

8 A. No, I'm not aware of any.

9 Q. You testified that whenever a third party  
10 could potentially have access -- 11:58:12

11 A. Yes.

12 Q. -- it would be -- there would be a lot of  
13 controls?

14 A. Yes.

15 Q. What were some of the instances of 11:58:20  
16 potential access that you were referring to?

17 A. Again, for access through those tools,  
18 I'm not aware of any.

19 Q. What about Spark, are you aware of any  
20 access by third parties? 11:58:40

21 A. No.

22 Q. Diagraph?

23 A. No.

24 Q. Centra?

25 A. No. 11:58:49



1 Q. SRT? 11:58:52

2 A. No.

3 MR. SAMRA: Okay. Thank you.

4 I think this is a good place for a break.

5 We can go off the record. 11:58:59

6 MS. RICHARDSON: Sure. How -- how long

7 do you want for a lunch, Josh?

8 MR. SAMRA: I'll leave it to Mr. Fisk and

9 Rebecca and John.

10 Oh, I think we're still on the record, 11:59:07

11 though.

12 MS. RICHARDSON: Do you want to go off

13 the record and we can talk about lunch.

14 THE VIDEOGRAPHER: Sure. Okay. We're

15 off the record. It's 11:59 a.m. . 11:59:19

16 (Recess taken.)

17 THE VIDEOGRAPHER: Okay. We're back on

18 the record. It's 1:03 p.m.

19 Q. (By Mr. Samra) Mr. Fisk, do you

20 understand you're still under oath? 01:03:11

21 A. Yes.

22 Q. We briefly discussed anonymization and

23 Hive.

24 Do you recall that?

25 A. Yes. 01:03:26

1 Q. Okay. So when it's generate -- when 04:00:32  
2 it -- when the PDF is created --  
3 A. Yes.  
4 Q. -- is it reflective of the privacy  
5 settings as of July 1st, 2022, or is it reflective 04:00:42  
6 of the settings as of October 28th, 2020?  
7 A. So there's two sets of settings here.  
8 The first settings will be the current settings  
9 when this was generated in July. And then this set  
10 would be from the October 28th, 2020, instead. 04:01:00  
11 So there's essentially two -- two copies  
12 of data. One from the past and one from the  
13 current when this was taken.  
14 Q. Thank you.  
15 Switching gears a bit. 04:01:21  
16 I want to talk to you about APIs and how  
17 they interact with Facebook and -- or excuse me --  
18 Hive and TAO.  
19 Are you aware generally of Graph API?  
20 A. Yes. 04:01:42  
21 Q. And are you aware that Graph API allows  
22 applications to access users' information?  
23 A. The Graph API has specific data that  
24 allows access to with user permissions and other  
25 sorts of controls, but yes. 04:02:04

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1 Q. And using Graph API, as an example, what 04:02:10  
2 happens in Hive when third parties make API  
3 requests for users' information?

4 A. Yeah. So the Graph API cannot possibly  
5 access Hive. It's both a -- a policy. But also a 04:02:25  
6 technical infeasibility for Graph API to access any  
7 sort of Hive data in the process.

8 Q. What intermediate steps are taken, if  
9 any, on Hive, when an API request is made on  
10 Graph API? 04:02:48

11 A. So, again, there's no -- there's no  
12 interaction between Graph API accessing data and  
13 Hive.

14 Q. Are API requests logged in Hive?

15 A. I believe there could be logs that are 04:03:10  
16 generated from these APIs that are ran into Hive.

17 Q. Is there a log of the third parties that  
18 have access to Graph API?

19 MS. RICHARDSON: Objection. Beyond the  
20 scope. 04:03:31

21 THE DEPONENT: Yeah. I'm not exactly  
22 sure how the third-party usage of these APIs are  
23 controlled. I know there's various logs and  
24 various controls that go into it. But I don't know  
25 all the specifics. 04:03:44

1 SPECIAL MASTER GARRIE: Counsel Samra, 04:45:54  
2 any further questions?  
3 EXAMINATION  
4 BY MR. SAMRA:  
5 Q. Mr. Fisk, earlier you were testifying 04:45:59  
6 about AI researchers having access to Hive,  
7 correct?  
8 A. Yes.  
9 Q. Are you aware of any external researchers  
10 having access to Hive? 04:46:11  
11 A. No.  
12 Q. What about to TAO?  
13 A. No.  
14 Q. Are you aware of external researchers  
15 having access to any of the tools that we discussed 04:46:21  
16 today?  
17 A. No.  
18 MR. SAMRA: Okay. No further questions.  
19 MS. RICHARDSON: And we're all -- we're  
20 all done, too. 04:46:34  
21 SPECIAL MASTER GARRIE: Okay. So  
22 Counsel Richardson, would you like to designate the  
23 transcript?  
24 MS. RICHARDSON: I would. I'd like to  
25 designate it as "Confidential" for now, and then 04:46:43

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